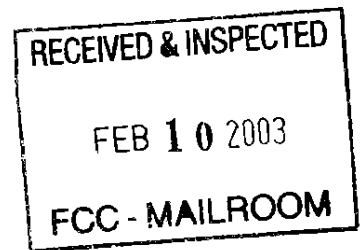


David C. Weston  
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February 8, 2003

Federal Communication Commission  
Office of the Secretary  
445 Twelfth Street, SW  
TW-A325  
Washington, DC 20554

**LETTER OF TRANSMITTAL**

RE Cohanrick Broadcasting Corp  
MR docket No 02-382  
RM-10615

Dear Sirs

Please find attached an original and Four (4) copies of my reply comments to the above captioned proposed rulemaking

In addition I have served a copy of these comments to:

Marnie K. Sarver Esq  
Wiley Rein and Felding, LLP  
1776 K Street, NW  
Washington D.C 20006

And

Mark N. Lipp Esq  
J. Thomas Nolan Esq.  
Shook, Hardy and Bacon LLP  
600 14<sup>th</sup> Street NW  
Suite 800  
Washington, DC 20005

Thank you in advance for your attention to these matters

Yours very truly,

A handwritten signature in black ink, appearing to read "David C. Weston".

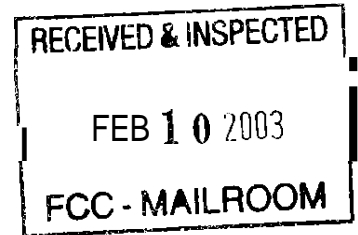
David C. Weston

No. of Copies rec'd  
List ABOVE

0+4

Federal Communication Commission

Before the  
Federal Communications Commission  
Washington, D.C. 20554



In the matter of )  
 )  
Amendment of Section 73.202(b) )  
FM Table of Allotment. )  
FM Broadcast Stations. )  
( Bridgeton and Pennsauken, New Jersey )

MB Docket NO. 02-382  
RM-10615

**REPLY COMMENTS TO  
NOTICE OF PROPOSED RULEMAKING**

**Adopted: December 13, 2002**

**Released December 16, 2002**

Comments Date: February 10, 2003  
Reply comments Date February 25, 2003

By **David C. Weston**, private citizen and prior student member of WHHS. FM

Dear Commission Members:

I respectfully request that you reject the above captioned proposed rulemaking and that you do so in and for the public interest of broadcasting. I submit the following facts to you for consideration.

1. Channel 300 (107.9 Mhz.) is currently being fully utilized by the School District of Haverford Township, 1801 Darby Road, Havertown, PA 19083
  2. Haverford Township and their non-commercial FM station have been continuously licensed as a broadcast station since 1948. Regular broadcasting began on December 6, 1949.
-

## Federal Communication Commission

3. During these FIFTY-SIX years, the station has been managed by the school district but operated entirely by the high school's student member staff
4. WHHS represents the oldest high school operated FM station in the United States today
5. WHHS was originally licensed for channel 207 (89.3 Mhz.) and was required by the Commission to relocate to 107.9 Mhz (circa 1990) in apparent violation of the Commission rules at that time.
6. Requiring WHHS to again relocate within the FM frequency spectrum would represent an extreme financial hardship to the not-for-profit School District of Haverford Township and would not result in the highest and best use of the vacated channel.
7. The costs associated with granting the proposed rulemaking and requiring WHHS to change frequency would result in the failure of the student station to continue broadcasting.
8. The proposed rulemaking, if granted, would cause a time-honored loss of a national treasure.
9. By refusing the rulemaking, the Commission will reaffirm the value of educational broadcasting and recognize the decades of accomplishments by the School District of Haverford Township, the devoted staff members, and the alumni graduates.

### **Chairman, Commission Members and FCC staff**

I thank you for taking the time today to consider an opposing point of view to the proposed rulemaking change. I am neither experienced in communications law nor Commission business, please forgive me. I do know something about broadcasting, radio, and WHHS.

I became a radio amateur in Pennsylvania at ten years of age in 1961. I lived in Havertown and later became a student member of WHHS from 1964 to 1968. During my tenure there and at 16 years of age, I earned my First Class radiotelephone license. I listened to WHHS as a pre-teen, became part of the station's operations as a high school student, and now assist as an alumnus.

Federal Communication Commission

WHHS is more than just a broadcasting station! Over the years it has given hundreds of students the direct experience of working together cooperatively to produce education and entertainment. The School District of Haverford Township has given the student station its full economic support and has established a unique and creative learning environment. I speak first hand when I tell you that the complete value of this channel is not to be measured by money or census data but rather the value and character of the many students that have participated and those that will participate.

**Commission Members.** this argument has not been lost on the Cohanzick Broadcasting Corporation. I have communicated directly with their senior management and staff. They are respectful of the many accomplishments of the WHHS and the School District of Haverford Township. Their position is that they would like to assist the students and preserve the station, however, Commission rules prevent them from working cooperatively with the School District. I believe that the Commission would benefit from granting a waiver to Cohanzick for the purpose of assisting the school district.

Ultimately the Commission must determine the highest and best use of the frequency spectrum. If you find for Cohanzick without providing for Haverford Township you will erase a great national accomplishment for decades to come. I believe your duty is with the students first and that you must, in this case and under these circumstances, deny the petitioner.

With highest regards,



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